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February 27, 2025

VIA ECF

Hon. James R. Cho, U.S.M.J.
United States District Court Eastern District of New York
225 Cadman Plaza East, Courtroom 11D South
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Cho:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case.

At the February 7, 2025 conference, the Court directed Plaintiff to re-serve subpoenas on the non-party observers, Christian Hogarth, Fari Gutierrez, Lizbeth Medina, Mark Purficati, and Sara Gonzalez on February 12, 2025 and the Court stated it would issue an order concerning Plaintiff's contempt motion by February 26, 2025 if the observers did not respond. There was some confusion on our end as we were waiting for an Order to be issued to this effect and we therefore did not serve the subpoenas on or before February 12, 2025. However, we have served them today. Attached is a declaration of service confirming same. Plaintiff will inform the Court within two (2) weeks from tomorrow, March 14, 2025, if the subpoenas are not complied with so that the Court may rule on Plaintiff's motion at that time as discussed at the February 7, 2025 conference.

Dated: Lake Success, New York

February 27, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York

February 27, 2025

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Case No.: 1:22-cv-1032 (PKC) (JRC)

Plaintiff,

DECLARATION OF SERVICE

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and
IME MANAGEMENT & CONSULTING LLC,

Defendants.

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Jamie S. Felsen, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Milman Labuda
Law Group PLLC, attorneys for the Plaintiff IME Watchdog, Inc. in this case.

2. On February 27, 2025, I re-served subpoenas duces tecum that were previously
served in April 2024 on the following individuals via Federal Express and e-mail as follows:

- a. Christian Hogarth, 7901 4th Avenue, Apr. F3, Brooklyn, NY 11209;
christianhogarth@yahoo.com
- b. Fari Gutierrez, 8117 102nd Avenue, Apartment 1, Ozone Park, NY 11416;
fgten03@yahoo.com
- c. Lizbeth Medina, 961 E 27th St., Paterson, NJ 07513;
lizbethmedina34@gmail.com
- d. Mark Purficiati, 50-19 104th Street, Corona, NY 11368;
markpurficiati@yahoo.com
- e. Sara Gonzalez, 2069 Union Street, Apt. 4F, Brooklyn, NY 11212;
sgmorales81@gmail.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on
February 27, 2025

/s/ Jamie S. Felsen